



Beck Reed Riden LLP
155 Federal Street | Suite 1302
Boston | Massachusetts 02110
Tel. (617) 500-8660 | Fax (617) 500-8665
BeckReedRiden.com

Stephen D. Riden
Direct: (617) 500-8672
sriden@beckreed.com

July 26, 2019

BY ELECTRONIC FILING

The Honorable Steven C. Mannion
United States District Court
for the District of New Jersey
Martin Luther King Building, Room 2B
50 Walnut Street
Newark, NJ 07101

Re: *inVentiv Health Consulting, Inc. v. Summer Atkinson*,
Civil Case No. 2:18-cv- 12560(ES)(SCM) – Joint Discovery Letter

Denied. The Court will discuss the proposed deadlines during the September 24, 2019 conference which shall occur telephonically. Plaintiff's counsel shall initiate.

s/Steven C. Mannion

Steven C. Mannion, U.S.M.J.

Dear Magistrate Judge Mannion,

Date:

7/31/19

This firm represents plaintiff inVentiv Health Consulting, Inc. ("inVentiv"). In light of this Court's July 16 Order extending the fact discovery deadline from September 18 to December 15, 2019 (Dkt. No. 31), the parties respectfully request that the Court also extend the below attendant deadlines in this matter. Ms. Atkinson joins in this request and has consented to the submission of this letter.

The Pretrial Order of January 18, 2019 (Dkt. No. 15, docketed Jan. 22, 2019) established the below deadlines, to which we propose the following changes. Order, § VI (16-18).

<u>Deadline</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Settlement Position Letters	September 16, 2019	December 20, 2019
Initial Expert Reports	October 15, 2019	January 15, 2020
Rebuttal Expert Reports	November 29, 2019	February 28, 2020
Expert Discovery Deadline	December 28, 2019	March 31, 2020

Additionally, we request that the currently-scheduled September 24, 2019 settlement conference be held telephonically.

InVentiv and Ms. Atkinson both request that the Court extend these deadlines in light of the recent discovery deadline extension in this case.